



OPASTCO

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July 14, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

***Ex Parte* Notice**

**Re: Federal-State Joint Board on Universal Service
CC Docket No. 96-45**

Dear Ms. Dortch,

On July 14, 2005, Gene Johnson of FairPoint Communications, Roger Nishi of Waitsfield & Champlain Valley Telecom, and John Rose and Stuart Polikoff of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) met with Cathy Carpino, Katie King, and Ted Burmeister of the Telecommunications Access Policy Division (TAPD) of the Wireline Competition Bureau (WCB).

In the meeting we reviewed the attached PowerPoint presentation. The presentation outlines OPASTCO's recommendations in the Universal Service Joint Board proceeding that is considering the appropriate rural high-cost support mechanism to succeed the Rural Task Force Order. Specifically, OPASTCO believes that: 1) Support for all eligible telecommunications carriers (ETCs) in rural service areas – both incumbent local exchange carriers (ILECs) and competitive ETCs – should be based on their own embedded costs; 2) the support calculation methodology for rural ILECs should continue to be based on their study area average total network costs; and 3) the complete statutory definition of “rural telephone company” should continue to be used for determining which carriers are “rural” for universal service purposes.

In accordance with FCC rules, this letter and attachment are being filed electronically in the above-captioned docket.

Sincerely,

Stuart Polikoff
Director of Government Relations
OPASTCO

Attachment